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July 5, 2022

**VIA ECF**

Honorable Paul A. Engelmayer  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2201  
New York, NY 10007

Re: *Kitchen Winners NY Inc. v. Rock Fintek LLC*, Case No. 22-cv-05276-PAE  
**Removal Letter**

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Dear Judge Engelmayer:

This firm represents defendant and counterclaim/third-party plaintiff Rock Fintek LLC in the above-captioned matter. Rock Fintek respectfully submits this letter pursuant to the June 23, 2022 Notice of Initial Pretrial Conference concerning the removal of this case, and states as follows:

1. Rock Fintek was the only defendant in this matter at the time of removal.
2. Rock Fintek was served with the complaint on or about May 25, 2022. The Notice of Removal was dated June 22, 2022, less than thirty (30) days after service.
3. The following is the citizenship of all parties in this case:
  - Plaintiff/counterclaim-defendant Kitchen Winners is a New York corporation with its principal place of business in Brooklyn, New York.
  - Defendant and counterclaim/third-party plaintiff Rock Fintek is a Delaware limited liability company whose sole member is Thomas Kato, an individual domiciled in and a citizen of the State of Florida.
  - Third-party defendant Adorama Inc. is a New York corporation with principal places of business located in Brooklyn and New York, New York.

- Third-party defendant Hershey Weiner is an individual believed to reside in Brooklyn, New York.
- Third-party defendant Joseph Mendlowitz is an individual believed to reside in Brooklyn, New York.
- Third-party defendant JNS Capital Holdings LLC is a New York limited liability company, whose member is believed to be Joel Stren, who resides in Brooklyn, New York.
- Third-party defendant Joel Stern is an individual believed to reside in Brooklyn, New York.

Respectfully submitted,

/s/Phillip Rakhunov  
Phillip Rakhunov

cc: Alexander J. Sperber (asperber@lipsiuslaw.com)  
Lipsius-Benhaim Law LLP  
*Counsel for Kitchen Winners NY Inc.*